

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
) 23 CR 451
v.)
) Judge Sharon Johnson Coleman
KENDRICK FRANCISCO)

**UNOPPOSED MOTION FOR EARLY TERMINATION
OF PROBATION**

Defendant Kendrick Francisco, by the Federal Defender Program and its attorney, Jack Corfman, respectfully moves this Court for early termination of his probation under 18 U.S.C. § 3564(c). This motion is not opposed by either the government or probation. In support of this motion, Mr. Francisco states as follows:

On March 20, 2024, this Court sentenced Mr. Francisco to 18 months' probation for making a false state to the U.S. Small Business Administration, in violation of 18 U.S.C. 654(a). Dkt. 20, Dkt. 23. In addition to standard conditions of probation, the court imposed a \$100 special assessment and \$10,000 in restitution.

Id. Mr. Francisco was on pretrial release for seven months without any reported violations prior to sentencing, and has had no reported violations of his probation in the year since. His probation is currently scheduled to expire in September of this year.

Mr. Francisco now respectfully seeks early termination of his probation. This Court has authority to terminate a term of probation at any time after the completion

of one year of supervision if the Court is satisfied, after considering the applicable sentencing factors under 18 U.S.C. § 3553(a), that early termination is warranted by the defendant's conduct and the interest of justice. 18 U.S.C. § 354(c).

Mr. Francisco, now 48, has worked hard to move forward, and has been fully compliant with the terms of his probation. He has repaid his special assessment and \$10,000 restitution in full, thus repaying the full loss amount from his offense. He has had no noted violations. He received permission to travel on vacation in July of last year that resolved without incident. Dkt. 25. And this case is his only criminal conviction of any kind—he was a criminal history category I with zero criminal history points at the time of sentencing.

Further, Mr. Francisco has been consistently employed by the CTA since 2023, a job he obtained before his sentencing and has maintained throughout. Prior to that, he was employed for fifteen years as a Markham police officer, but he has not let the loss of that job prevent him from maintaining his role as a father and his community connections. As the Court may recall, he is a deeply involved father of 3—his stepdaughter, now enrolled in college, and two high school boys. His family and friends submitted strong letters of support on his behalf at his sentencing, which he has endeavored to live up to every day throughout his supervision.

In short, Mr. Francisco is an excellent candidate for early termination of probation, and his conduct demonstrates that he does not need the supervision of the Court or Probation to be a productive, contributing, and law-abiding member of society.

United States Probation Officer Leslie Culp has stated that Probation does not oppose this request. Likewise, Assistant United States Attorney Brian Hayes has stated that the government has no objection to early termination.

WHEREFORE, Kendrick Francisco respectfully requests that this Honorable Court grant his motion for early termination of probation.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM
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